

**United States Bankruptcy Court
Eastern District of Pennsylvania**

In re:

Andrew L. Dudzek and
Jennifer L. Dudzek,

Debtors.

Case No. 22-12581-amc

Chapter 13

Motion to Modify Plan After Confirmation

Debtors Andrew L. Dudzek and Jennifer L. Dudzek, through their attorney, move this Court as follows:

1. The Debtors filed a bankruptcy petition on September 26, 2022.
2. The plan was confirmed on April 6, 2023.
3. Debtor 1 is a Philadelphia police officer who was injured on the job in October 2023, and after being relegated to desk duty his monthly take home pay decreased by \$3,739, and he and Debtor 2 fell behind on the plan payments as a result, and a motion to dismiss ("MTD") was filed on March 6, 2024.
4. His plan was successfully modified from a 100% plan to a pro-rata plan on July 18, 2024 to resolve the MTD and temporarily reduce the plan payments for 6 months from \$3,125 to \$1,415, in the hopes that Debtor 1 would soon recover and return to his previous duties and level of income.
5. The plan payments were supposed to go back up to \$3,125 in January 2025, which was when Debtor 1 had hoped to have returned to his previous duties and income level.
6. Debtor 1 has not recovered, and it appears he may never be able to return to his former duties, and he has only been able to afford continuing to pay the \$1,415 the last few months of the instant case.
7. The proposed plan lowers the monthly plan payment to \$1,415 for the remainder of the bankruptcy.
8. The Debtors ask that the Court approve the proposed plan filed at ECF No. 82.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtors' favor if necessary and proper under the law.

Date: July 21, 2025

CIBIK LAW, P.C.
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